

**UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

EXIMANDA BAXTER,

Plaintiff,

V.

**STANLEY D. BROOME, Individually,
MATTHEW W. BOBO, Individually,
BROOME BOBO LLP, and,
HOWIE, BROOME & BOBO, LLP,**

Defendants.

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**CASE NO. 3:07cv2036-M**

**MOTION FOR INDIVIDUAL ATTORNEY TO WITHDRAW**

COMES NOW, JILL WEINBERG, of The Weinberg Law Firm (collectively – “Weinberg”), and respectfully requests that the Court enter an Order permitting JILL WEINBERG, only, to withdraw as counsel for Plaintiff (hereinafter the “Plaintiff” or “Client”).

1. James Albert Jennings and W. Christopher W. Haynes of Erhard & Jennings, P.C., 1601 Elm Street, Suite 4242, Dallas, Texas 75201 have and will continue to act as lead counsel and the primary attorneys of record for Plaintiff, Eximanda Baxter.
2. Weinberg is a sole practitioner. She has of late been required to spend a very significant amount of time dealing with an extremely serious illness of her husband and his extended recuperation from that illness. During the period just prior to the onset of her husband's illness, she had previously taken on a number of time-consuming new legal assignments, including this case. Given the realities of her current personal and professional situation Ms. Weinberg is simply unable to continue on in the referenced cause. Mr. Jennings and his firm are in full agreement with this decision and have no opposition to same.

3. The Client has been contacted by Mr. Jennings and is in full agreement with Ms. Weinberg's withdrawal and understands that the lawyers of Erhard & Jennings will remain her lead counsel in this case, a copy of her consent to this Motion is appended at page "4" hereof.
4. This Motion is sought in the interest of justice and is not sought for delay only and the granting of this Motion will not delay this matter.
5. As referenced in the Certificate of Conference, Defendants' counsel is unopposed to this Motion.
6. Plaintiff requests that Ms. Weinberg be allowed to immediately withdraw from further representation in this cause.
7. Plaintiff seeks the relief prayed for herein.

Respectfully submitted,

By: /s/ James Albert Jennings

James Albert Jennings  
SBN: 10632900  
W. Christopher W. Haynes  
SBN: 09284100

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- and -

By: /s/ Jill J. Weinberg

Jill J. Weinberg  
SBN: 21084400

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ATTORNEYS FOR PLAINTIFF

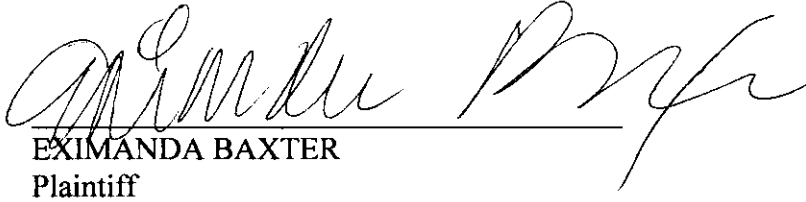
**CERTIFICATE OF CONFERENCE**

On February 29, 2008, counsel for the parties conferred and counsel for Defendants is UNOPPOSED to this Motion to Withdraw.

/s/ James Albert Jennings

James Albert Jennings

AGREED TO AND APPROVED BY:

  
EXIMANDA BAXTER  
Plaintiff

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was delivered via electronic filing to Mr. Jackson D. Wilson, II, Gordon & Rees LLP, 2100 Ross Avenue, Suite 2800, Dallas, Texas 75201 on February 29, 2008.

/s/ James Albert Jennings  
James Albert Jennings